

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

United States of America  
*ex rel.* ALEX DOE, Relator,

The State of Texas  
*ex rel.* ALEX DOE, Relator,

The State of Louisiana  
*ex rel.* ALEX DOE, Relator,  
Plaintiffs,

v.

Defendants.

CIVIL ACTION NO. 2:21-CV-  
00022-Z

Date: November 6, 2023

**DEFENDANTS' DESIGNATION OF EXPERT WITNESSES**

Defendants Planned Parenthood Federation of America, Inc. ("PPFA"), Planned Parenthood Gulf Coast, Inc., Planned Parenthood of Greater Texas, Inc., Planned Parenthood South Texas, Inc., Planned Parenthood Cameron County, Inc., and Planned Parenthood San Antonio, Inc. (together "Affiliate Defendants," and collectively with PPFA, "Defendants") file this designation under this Court's Scheduling Order (*see* ECF No. 555 at 2 ("the party with the burden of proof on the issue subject to the expert designation shall file a written designation of the name and address of each expert witness who will testify at trial for that party and shall otherwise comply with Rule 26(a)(2) on or before Monday, November 6, 2023")) in an abundance of caution. By filing this designation and identifying the six experts listed below, Defendants do not assume any burden of proof on any issue or claim in this case. Defendants reserve the right to argue in connection with their submission of proposed jury instructions and a verdict form that the law

places on Plaintiffs the burden of proving the causes of action that they assert in this case and the issues underlying those causes of action.

Defendants may call the following retained expert witnesses to testify at trial:

1. Anitra Beasley, M.D., M.P.H.

Based on her background, education, and experience, Dr. Beasley will testify in accordance with her October 6, 2022 Rule 26(a)(2)(C) disclosure.

2. Robin Anne Alta Charo  
Professor Emerita, University of Wisconsin-Madison  
2900 Connecticut Ave NW  
Washington DC 20008

Based on her background, education, and experience, Ms. Charo will testify in accordance with the opinions disclosed in her October 6, 2022 expert report.

3. Louis G. Dudney, CPA, CFF  
Managing Director, Alix Partners  
300 N. LaSalle Street, Suite 1800  
Chicago, IL 60654

Based on his background, education, and experience, Mr. Dudney will testify in accordance with the opinions disclosed in his October 6, 2022 expert report and his December 7, 2022 deposition.

4. Cara C. Heuser, M.D., M.S.  
Associate Professor, University of Utah Medical Center  
Intermountain Medical Center, Maternal-Fetal Medicine  
5121 South Cottonwood Street, Ste D-100  
Salt Lake City, UT 84107  
  
Department of Obstetrics and Gynecology  
University of Utah  
30 North 1900 East  
Salt Lake City, UT 84132

Based on her background, education, and experience, Dr. Heuser will testify in accordance with the opinions disclosed in her October 6, 2022 expert report.

5. Louis F. Rossiter, Ph.D.  
Research Professor, The College of William & Mary  
PO Box 8795  
Williamsburg, VA 23187

Based on his background, education, and experience, Dr. Rossiter will testify in accordance with the opinions disclosed in his October 6, 2022 expert report and his November 10, 2022 deposition.

6. David Sokolow  
Distinguished Senior Lecturer, The University of Texas Law School  
3005 Maywood Circle  
Austin, Texas 78703

Based on his background, education, and experience, Mr. Sokolow will testify in accordance with the opinions disclosed in his October 4, 2022 expert report and his November 22, 2022 deposition.

Dated: November 6, 2023

Respectfully Submitted,

ARNOLD & PORTER KAYE SCHOLER LLP

/s/ Tirzah S. Lollar

CRAIG D. MARGOLIS

Craig.Margolis@arnoldporter.com

TIRZAH S. LOLLAR

Tirzah.Lollar@arnoldporter.com

CHRISTIAN D. SHEEHAN

Christian.Sheehan@arnoldporter.com

JAYCE BORN

Jayce.Born@arnoldporter.com

EMILY REEDER-RICHETTI

Emily.Reeder-Ricchetti@arnoldporter.com

MEGAN PIEPER

Megan.Pieper@arnoldporter.com

ALYSSA GERSTNER

Alyssa.Gerstner@arnoldporter.com

MEGHAN C. MARTIN

Meghan.Martin@arnoldporter.com  
601 Massachusetts Ave, NW  
Washington, DC 20001-3743  
Telephone: +1 202.942.6127  
Fax: +1 202.942.5999

PAULA RAMER  
Paula.Ramer@arnoldporter.com  
250 West 55th Street New York,  
New York 10019-9710  
T: +1 212.836.8474

CHRISTOPHER M. ODELL  
Texas Bar No. 24037205  
Christopher.Odell@arnoldporter.com  
700 Louisiana Street, Suite 4000  
Houston, TX 77002-2755  
Telephone: +1 713.576.2400  
Fax: +1 713.576.2499

RYAN BROWN ATTORNEY AT LAW  
RYAN PATRICK BROWN  
Texas Bar No. 24073967  
ryan@ryanbrownattorneyatlaw.com  
1222 S. Fillmore St.  
Amarillo, Texas 79101  
T: (806) 372-5711  
F: (806) 350-7716

*Attorneys for Defendants Planned Parenthood  
Gulf Coast, Inc., Planned Parenthood of Greater  
Texas, Inc., Planned Parenthood of South Texas,  
Inc., Planned Parenthood Cameron County, Inc.,  
and Planned Parenthood San Antonio, Inc.*

Respectfully submitted,

O'MELVENY & MYERS LLP

/s/ Danny S. Ashby  
DANNY S. ASHBY  
Texas Bar No. 01370960  
dashby@omm.com  
MEGAN R. WHISLER  
Texas Bar No. 24079565  
mwhisler@omm.com

2501 N. Harwood Street, Suite 1700  
Dallas, Texas 75201  
T: (972) 360-1900  
F: (972) 360-1901

LEAH GODESKY (*pro hac vice*)  
lgodesky@omm.com  
1999 Avenue of the Stars, 8th Floor  
Los Angeles, California 90067  
T: (310) 553-6700  
F: (310) 246-6779

ANTON METLITSKY (*pro hac vice*)  
ametlitsky@omm.com  
7 Times Square  
New York, New York 10036  
T: (212) 326-2000  
F: (212) 326-2061

RYAN BROWN ATTORNEY AT LAW  
RYAN PATRICK BROWN  
Texas Bar No. 24073967  
ryan@ryanbrownattorneyatlaw.com  
1222 S. Fillmore St.  
Amarillo, Texas 79101  
T: (806) 372-5711  
F: (806) 350-7716

*Attorneys for Defendant Planned Parenthood  
Federation of America, Inc.*

**CERTIFICATE OF SERVICE**

I hereby certify that on November 6, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system, which will send a notice of electronic filing to all participating counsel of record.

/s/ Tirzah S. Lollar

Tirzah S. Lollar